

Exhibit C

Message

From: Lynn Teague [teague Lynn@gmail.com]
Sent: 2/4/2021 11:57:08 PM
To: Ruoff John [jcruoff@gmail.com]
CC: Matthew Saltzman [m.j.saltzman@gmail.com]; Howell Shayna [shaynahowell@gmail.com]; Christe McL
Subject: Re: ACLU redistricting work

I was pretty sure you had Susan on speed dial.

Lynn Shuler Teague
 VP for Issues and Action, L WVSC
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 803 556-9802

On Feb 4, 2021, at 5:25 PM, John Ruoff <jcruoff@gmail.com> wrote:

I will do that. I have been their expert in numerous VRA cases over the years and I've known Susan for over 40 years. It would be good to have their advice on the VRA districts.

As one friend once said about Brett: The one thing you can count on when dealing with Bursey is that he's dealing in bad faith.

John

On Feb 4, 2021, at 5:15 PM, Lynn Teague <teague Lynn@gmail.com> wrote:

Susan Dunn and I had a good talk this morning. She is picking up Ali Titus' work for the time being, since Ali has left ACLU.

Among other things, she wanted to touch base on redistricting because ACLU's national folks want to prioritize work on South Carolina. They assume that they will be litigating racial gerrymanders when all is said and done. Susan's concern was to make sure that we didn't take this amiss, or feel that our toes are trod upon, or think that their national folks were coming in to be the new big dog on the block. So, she isn't trying to get us to sign onto anything and everything they do, just wanting to keep things mutually beneficial.

Susan indicated that their national group has really fabulous resources and would be glad to provide helpful info. John, you have raised several times the issue of the racial polarization figures. I asked about that and she said she was certain they would develop them and be happy to provide them to us. So, John, I suggested that you should touch base with her tomorrow and get info on what they are doing and how we could most productively interact the technical front, perhaps text her for a time and set up a zoom with Matt as well.

All of this is with the clear understanding that we are continuing our own work, and that our maps and assessments might differ from theirs. We agreed that we can easily treat this as "here are multiple instances of good faith efforts from our respective organizations to produce maps not biased toward incumbents or parties." Susan says this is actually to their advantage, since one of their concerns is to get legislative responses to various scenarios to better define their motives for potential litigation.



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Failure to take this approach was actually the last straw in my dealings with Brett Bursey. I had told him that the League had no need or wish to disparage his different approach, and that while we wouldn't agree to do things according to his plan, we would simply treat their efforts as a good faith response to the problem from another organization with a somewhat different strategy. Nope. Not good enough for Brett. Next thing I knew there was heavy handed pressure to sign onto his plan, both from him and others, and Prog. Network was putting out statements directly attacking our efforts.

Which brings me to some good news from Susan — Brett is being replaced at Prog Network by someone Susan says she has seen briefly in action. She couldn't recall his name during our call, but says he seems impressively capable and focused on the work, not on ego. So perhaps we can look forward to progress with the Progressive Network.

John, could you touch base with Susan? I'm sure you have this, but her email is sdunn@aclusc.org and her phone is 843 282-7953.

Thanks!

Lynn

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